

United States Environmental Protection Agency Region 10 Emergency Response Unit POLLUTION REPORT

I. HEADING

Date: March 6, 2000

Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington

From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit

Tel: Office (206) 553-0279

TO: See Distribution List on last page

POLREP No.12 (Progress)

II. BACKGROUND

Site ID: SSID # 106W Delivery Order No: 081-10 -02

Response Authority: CERCLA,

CERCLIS No: WASFN1002182

NPL Status: Not Listed (former RCRA site within Commencement

Bay Superfund site)

State Notification: Washington State Department of Ecology referred site

to EPA

Action Memo Status: Signed on December 17, 1999 and January 7, 2000

Removal Start Date: December 17, 1999 Expected Completion Date: March 17, 2001

Site Web Page: www.epa.gov/r10earth, click Index, click C for

CleanCare. or use URL: http://epainotes1.rtpnc.epa.

gov:7777/r10/cleanup.nsf/sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47/ 16' 25" North and longitude 122/ 23' 32" West. The site is located in the ATacoma Tideflats@ area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

February 28, 2000 (Monday)

Personnel on site: 3 START, 14 ERRS, 3 USCG, 2 EPA Weather: low 40s to low 50s, intermittent rain, low wind All site personnel attended daily safety meeting and discussed site safety and planned activities. START inventoried solvent drums, collected a sample of treated water prior to making discharge request. ERRS continued staging drums by product name, Continued treatment of contact water, Loaded RCRA drums into dumpster, Conducted Hazcatting of samples in Building 5, Generators on site to pick up their drums (30 drums shipped), Emerald Services on site to pick up waste water from Baker Tank 9 (17,503 gallons shipped), Pumped solvent drums into vacuum truck and transfered into Baker Tank 9.

February 29, 2000 (Tuesday)

Personnel on site: 5 START, 14 ERRS, 3 USCG, 1 EPA

Weather: rain, overcast, low 40's F

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued inventory of spent solvent drums, Inventoried all antifreeze drums staged near BT 18 and planned the sampling of Aboveground Storage Tanks (ASTs) in Tank Farm 2. ERRS continued treatment of contact water, Loaded RCRA drums into dumpster, Philip Services transported 27 cubic yards of crushed drums to Columbia Ridge Landfill, Staging drums in Building 5 into their proper group after Hazcat, Generators on site to pick up their drums (142 drums shipped today), Pumped solvent drums into vacuum truck and transfer into Baker Tank 9, Sampling of ASTs T-3, T-4, and T-5 in Tank Farm 1, Transferred empty solvent drums to crushing area. Emerald Services picked up 24,453 gallons of waste water for disposal.

March 1, 2000 (Wednesday)

Personnel on site: 5 START, 14 ERRS, 3 USCG, 1 EPA

Weather: sunny, cool, high of 45 F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START oversaw and documented generator drum removal activities (61 drums shipped today), Continued inventory of spent solvent drums, Continued managing and entering data related to RCRA or non oil filter drums, Used the oil/water interface probe to determine the contents of ASTs T-7 to T-14, Collected phase samples from AST numbers T-7 and T-8 and interval samples from AST number T-7, and Assisted ERRS with drum organization. ERRS continued treatment of contact water, Staging drums in Building 5 into their proper waste category after Hazcat, Loaded drums into trucks for generators to pickup, Pumped solvent drums into vacuum truck and transfer into Baker Tank 9, Assisted with sampling of ASTs in Tank Farm 2, Transferred empty solvent drums to crushing area. Emerald Services picked up 48,690 gallons of waste water for disposal.

March 2, 2000 (Thursday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 1 EPA

Weather: Clear, light breeze, cold, high lower 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START oversaw and documented generator drum removal activities (102 drums and 12 fish totes shipped today), Continued oversight of on site activities, Collected phase samples from ASTs T-9 to T-14 and interval samples from ASTs T-8 to T-11 and T-13 and T-14. ERRS continued treatment of contact water, Staging drums in Building 5 into their proper group after Hazcat, Loaded drums into trucks for generators to pickup, Pumped solvent drums into vacuum truck and transfer into Baker Tank 9, pre-cleaned Baker Tank 23 so it can be moved by the

treatment system to store contact water, Assisted with sampling of ASTs in Tank Farm 2, Emerald Services picked up 29,945 gallons of waste water for disposal.

March 3, 2000 (Friday)

Personnel on site: 5 START, 14 ERRS, 3 USCG, 1 EPA Weather: Overcast, light breeze, high in the mid 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START oversaw and documented generator drum removal activities (87 drums shipped today), Collected phase samples from AST T-15 and interval samples from ASTs T-12 and T-15 completing AST sampling in Tank Farm 2, Used the oil/water interface probe to determine the contents of tanks T-18 to T-25. ERRS continued treatment of contact water, Continued moving drums out of Building 5 and placing them into their proper waste stream, Pumped down contact water in processing area, Staged solvent drums in staging area, Loaded drums into trucks for generators to pickup, Assisted with sampling of ASTs in Tank Farm 2.

March 4, 2000 (Saturday)

Personnel on site: 2 START, 0 ERRS, 0 USCG

Weather: Overcast, light rain until 11 AM, light breeze, high in the

low 50's

START managed data from the shipping documents, and prepared pollution reports.

2.Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of treated contact water.

Drums -

Oil Filter Drums: This phase of the project is completed.

RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums). Selected generators have removed a total of 422 drums and 12 totes of waste.

Oil Drums in Building #5: Continued sampling and collecting data for the

oil drums located in the southern portion of Building #5 and started performing Hazard Categorization tests on these samples. The material from 35 of these drums and 4 totes was pumped into a 6,000 gallon storage tank to reduce disposal costs. Disposal facility to be determined.

Antifreeze Drums: Antifreeze from 52 drums has been pumped into Baker Tank #18. All identified drums of antifreeze (108) have been inventoried and staged north of BT # 18 for bulking prior to disposal. Disposal facility to be determined.

Solvent Drums: All identified drums of spent solvent have been inventoried. Spent Solvent from 520 drums has been pumped into BT # 9 for bulking prior to disposal. Disposal facility to be determined.

Baker Tanks - To date 264,334 gallons of water has been hauled off-site by Emerald Services for disposal. Treated and discharged three batches (approximately 60,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Baker Tanks are decontaminated and returned to the vendor after they are emptied.

Surface Water - This week, continued treating contact surface water and decontamination water with the temporary waste water treatment system. Terminated discharge of non contact surface water to the Lincoln Ave. ditch. Discharge was previously performed under agreement with Washington State Department of Ecology.

ASTs - To date all of the ASTs (with fluid) in Tank Farm 1 (T-1, T-3, T-4, and T-5) and Tank Farm 2 (T-7, T-8, T-9, T-10, T-11, T-12, T-13, T-14, and T-15) have been sampled. Tank Farm 2 AST T-6 was not sampled because it was empty. The contents of Tank Farm 3 (T-18, T-19, T-20, T-21, T-22, T-23, T-24 and T-25) have been determined using an oil/water interface probe.

Soil - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

3.Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B.Planned Removal Activities

To minimize/eliminate to threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

- <u>Drums:</u> organization of drums and documents (manifests & profile analyses), generator notification, hazard categorization and disposal tests, and removal of containers from the site.
- <u>Baker Tanks:</u> The water from some tanks will continue to be treated on site and discharged. At the same time, water from other Baker Tanks will continue to be shipped off site. As tanks are emptied, they will be returned to the rental company.
- <u>Surface Water:</u> manage surface water as it collects onsite (including sampling, treatment, and discharge), clean concrete and asphalt surfaces that currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.
- ASTs: sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site
 - <u>Soil:</u> Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C.Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Complete the data management for all RCRA drums, locate and file the manifests for the RCRA drums, and prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Discharge treated contact and non contact water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks as they are emptied and return them to the vendor.

D.Key Issues

<u>Security</u> Off Duty City of Tacoma Police continue with site security. <u>Discharge of non contact waters</u> Non contact surface water is no longer being discharged to the Lincoln Avenue Ditch. All non contact surface water is being treated along with the contact surface water. Previously, after receiving daily permission from the Washington State Department of Ecology (DOE), and on an emergency basis, non contact surface water was discharged following DOE established discharge requirements.

Management of contact water; Contact surface water (that which falls with in the secondary containment structures) is being pumped into temporary storage tanks (Baker Tanks). This water will has been analyzed and some of it is being treated and discharged and some is being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

<u>Drum/Container Waste</u>; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs (as of 2/19/00)
EPA	\$ 150,000	\$24,800
START	\$ 350,000	\$100,066
ERRS	\$ 1,100,000	\$ 668,737
Coast Guard	\$ 100,000	<u>\$41,691</u>
Total	\$ 1,700,000	\$ 835,294

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	120 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
Used RCRA Drums	solid waste	124 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
Generator Drums	sludges and liquids	422 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	20 cu yd	placed liners in rolloffs	consolidated in rolloffs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	264,334 gal	contained in Baker Tanks	Emerald Petroleum Services=s (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	83,400 gal	contained in Baker Tanks	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	60,000 gal	contained in Baker Tanks	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks	solid	Tank 15	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks, Inc.)
Tip Trailers	solid	11 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	60 drums + 4 totes		a 6,000 gallon poly tank on site	to be determined
Antifreeze from Drums	liquid	65 drums		bulked into Baker Tank #18	to be determined

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby

EPA Region 10, Emergency Response Unit, Attention: Chris Field

EPA Washington Operations Office, Attention: Julie Hagensen

Puyallup Tribe of Indians, Attention: Bill Sullivan

Washington State Department of Ecology, Attention: Jim Sachet City of Tacoma Public Works Department, Attention: Michael Kennedy

EPA Region 10 Web page, Attention: Beth Kunz

EPA Region 10, Emergency Response Unit, Attention: OSCs

VIII Status

Case Pending.